

# United States District Court

Southern

DISTRICT OF

New York

SANTIAGO ALVEAR

## SUMMONS IN A CIVIL CASE

V.

CASE NUMBER:

1 WORLD TRADE CENTER LLC,  
ET AL SEE ATTACHED RIDER,

TO: (Name and address of defendant)

See attached rider

**YOU ARE HEREBY SUMMONED** and required to serve upon PLAINTIFF'S ATTORNEY (name and address)

WORBY GRONER EDELMAN & NAPOLI BERN. LLP  
115 Broadway, 12th Floor  
New York, New York 10006  
212-267-3700

an answer to the complaint which is herewith served upon you, within 30 days after service of this summons upon you, exclusive of the day of service. If you fail to do so, judgment by default will be taken against you for the relief demanded in the complaint. You must also file your answer with the Clerk of this Court within a reasonable period of time after service.

J. MICHAEL McMAHON

CLERK

*Manos Quintero*

(BY) DEPUTY CLERK

MAR 22 2006

DATE

Service of the Summons and Complaint was made by me: NAME OF SERVER (PRINT)	DATE TITLE
--	---------------

Check one box below to indicate appropriate method of service

- ☐ Served personally upon the defendant. Place where served: \_\_\_\_\_
- ☐ Left copies thereof at the defendant's dwelling house or usual place of abode with a person of suitable age and discretion then residing therein.  
Name of person with whom the summons and complaint were left: \_\_\_\_\_
- ☐ Returned unexecuted: \_\_\_\_\_
- ☐ Other (specify): \_\_\_\_\_

STATEMENT OF SERVICE FEES		
TRAVEL	SERVICES	TOTAL
DECLARATION OF SERVER		

I declare under penalty of perjury under the laws of the United States of America that the foregoing information contained in the Return of Service and Statement of Service Fees is true and correct.

Executed on \_\_\_\_\_  
Date

\_\_\_\_\_  
Signature of Server

\_\_\_\_\_  
Address of Server

(\*) As to who may serve a summons see Rule 4 of the Federal Rules of Civil Procedure

Plaintiffs,

- against -

1 WORLD TRADE CENTER LLC; 1 WTC HOLDINGS LLC; 2 WORLD TRADE CENTER LLC; 2 WTC HOLDINGS LLC; 4 WORLD TRADE CENTER LLC; 4 WTC HOLDING LLC; 5 WORLD TRADE CENTER LLC; 5 WTC HOLDING LLC; A RUSSO WRECKING, INC.; ABM; ABM INDUSTRIES, INC.; ABM JANITORIAL NORTHEAST, INC.; AMEC CONSTRUCTION MANAGEMENT, INC.; AMEC EARTH & ENVIRONMENTAL, INC.; ANTHONY CORTESE SPECIALIZED HAULING LLC; ATLANTIC HEYDT CORP.; BECHTEL CONSTRUCTION, INC.; BECHTEL CORPORATION; BECHTEL ENVIRONMENTAL, INC.; BERKELE & COMPANY, CONTRACTORS, INC.; BFP Tower C Co. LLC; BIG APPLE WRECKING & CONSTRUCTION CORP.; BOSTON PROPERTIES; BOVIS LEND LEASE LMB, INC.; BOVIS LEND LEASE, INC.; BREEZE CARTING CORP.; BREEZE NATIONAL INC.; BRER FOUR TRANSPORTATION CORP.; BURO HAPFOLD CONSULTING ENGINEERS, P.C.; C & D FIREPROOFING & PLASTERING CORP.; C.B. CONTRACTING CORP.; CANRON CONSTRUCTION CORP.; CANTOR SEINUK GROUP; CERTIFIED FENCE CORP.; CIVETTA-COUSINS JV, L.L.C.; CLARCOR AIR FILTRATION PRODUCTS, INC.; COMPONENT ASSEMBLY SYSTEMS, INC.; CONSOLIDATED EDISON COMMUNICATIONS HOLDING COMPANY, INC.; CONSOLIDATED EDISON COMPANY OF NEW YORK, INC.; CONSOLIDATED EDISON DEVELOPMENT, INC.; CONSOLIDATED EDISON ENERGY, INC.; CONSOLIDATED EDISON SOLUTIONS, INC.; CONSOLIDATED EDISON, INC.; COORDINATED METALS, INC.; CORD CONTRACTING CO., INC.; CRAIG TEST BORING COMPANY INC.; CRITICOM INTERNATIONAL CORPORATION; CUSHMAN & WAKEFIELD, INC.; D'ONOFRIO GENERAL CONTRACTORS CORP.; DAKOTA DEMO-TECH, INC.; DCM ERECTORS, INC.; DIAMOND POINT EXCAVATING CORP.; DIEGO CONSTRUCTION, INC.; DIVERSIFIED

EAGLE ONE ROOFING CONTRACTORS INC.;  
 EAGLE SCAFFOLDING CO., INC.; EJ DAVIES,  
 INC.; EN-TECH CORP.; ET ENVIRONMENTAL;  
 EVERGREEN RECYCLING OF CORONA(FROC);  
 EWELL W. FINLEY, P.C.; EXECUTIVE  
 MEDICAL SERVICES, P.C.; F&G  
 MECHANICAL, INC.; FELIX EQUITTES, INC.;  
 FLEET TRUCKING, INC.; FRANCIS A. LEE  
 EXTERIOR RESTORATION, INC.; FRANK  
 MICELLI JR. CONTRACTING, INC.; FTI  
 TRUCKING, INC.; GILSANZ, MURRAY, & STEFICK,  
 LLP; GOLDSTEIN ASSOCIATES CONSULTING  
 ENGINEERS, PLLC.; GRACE INDUSTRIES, INC.; HALLEN  
 WELDING SERVICE, INC.; HELMSMAN MANAGEMENT  
 SERVICES, INC.; HGC CONTRACTING CORP.; HIGH-RISE  
 ELECTRIC, INC.; HIGH RISE HOISTING AND  
 SCAFFOLDING, INC.; JP EQUIPMENT  
 RENTAL MATERIALS, INC.; LAQUILA  
 CONSTRUCTION INC.; LASTRADA GENERAL  
 CONTRACTING CORP.; LESLIE E. ROBERTSON  
 ASSOCIATES CONSULTING ENGINEERS P.C.;  
 LIBERTY MUTUAL INSURANCE COMPANY;  
 LIBERTY MUTUAL MANAGED CARE INC.;  
 LOCKWOOD, KESSLER & BARTLETT, INC.; LUCIUS  
 PITKIN, INC.; LZA TECH-DIV OF THORTON  
 TOMASETTI; MANAFORT BROTHERS  
 INCORPORATED; MAZZOCCHI WRECKING, INC.; MENT  
 BROS. IRON WORKS CO., INC.; MERIDIAN  
 CONSTRUCTION GROUP; MOODY'S INVESTORS  
 SERVICE; MRA ENGINEERING, PC; MUESER  
 RUTLEDGE CONSULTING ENGINEERS, INC.;  
 MUSCO SPORTS LIGHTING, LLC.; NACIREMA  
 INDUSTRIES INCORPORATED; NEW YORK CRANE &  
 EQUIPMENT CORP.; NYC INDUSTRIAL DEVELOPMENT  
 AGENCY; NICHOLSON CONSTRUCTION COMPANY;  
 OLYMPIC PLUMBING & HEATING CORP.; OVE ARUP &  
 PARTNERS P.C.; PARSON GROUP, INC.; PETER  
 SCALAMANDRE & SONS, INC.; PINNACLE;  
 PINNACLE ENVIRONMENTAL CORP.; PLAZA  
 CONSTRUCTION CORP.; PLAZA  
 CONSTRUCTION MANAGEMENT CORP.; PRO  
 SAFETY SERVICES LLC.; PT & L CONTRACTING  
 CORP.; REGIONAL SCAFFOLDING & HOISTING CO.,  
 INC.; ROBER SILMAN ASSOCIATES; ROBERT  
 ERRAT; ROBERT L. GEROSA, INC.; ROYAL  
 GM, INC.; SAB TRUCKING INC.; SAFEWAY  
 ENVIRONMENTAL CORP.; SEASONS INDUSTRIAL  
 CONTRACTING; SHELDRAKE ORGANIZATION, INC.;  
 SILVERITE CONTRACTING CORPORATION;  
 SILVERSTEIN DEVELOPMENT CORP.;  
 SILVERSTEIN PROPERTIES INC.;

SILVERSTEIN WTC LLC; SILVERSTEIN WTC  
 MGMT CO. LLC.; SILVERSTEIN WTC  
 PROPERTIES LLC.; SIMPSON GUMPERTZ & HEGER  
 INC.; SKIDMORE, OWING & MERRILL LLP; STAR  
 DELTA ELECTRIC, INC.; STER ANDERSON, LLC.;  
 SURVIVAIR; TISHMAN CONSTRUCTION  
 CORPORATION OF MANHATTAN; TISHMAN  
 CONSTRUCTION CORPORATION OF NEW  
 YORK; TISHMAN SPEYER PROPERTIES;  
 TOMASETTI GROUP, INC.; TORRETTA  
 TRUCKING, INC.; TOTAL SAFETY CONSULTING,  
 LLC.; TRIO ASBESTOS REMOVAL; TUCCI EQUIPMENT  
 RENTAL CORP.; TULLY CONSTRUCTION CO.,  
 INC.; TULLY CONSTRUCTION COMPANY;  
 TULLY ENVIRONMENTAL INC.; TULLY  
 INDUSTRIES, INC.; TURNER CONSTRUCTION  
 CO.; TURNER CONSTRUCTION COMPANY;  
 TURNER CONSTRUCTION INTERNATIONAL,  
 LLC.; ULTIMATE DEMOLITION/CS HAULING  
 (JOINT VENTURE); UNITED STATES REBAR, INC.;  
 VOLLMER ASSOCIATES LLP.; W HARRIS & SONS  
 INC.; WEEKS MARINE, INC.; WEEDINGER  
 ASSOCIATES, CONSULTING ENGINEERS, P.C.;  
 WESTFIELD AMERICA, INC.; WESTFIELD  
 WTC HOLDING LLC; WESTFIELD WTC, LLC.;  
 WFP TOWER D. CO., LP; WHITNEY CONTRACTING  
 INC.; WOLKOW-BRAKER ROOFING CORP.; WORLD  
 TRADE CENTER PROPERTIES LLC.;  
 YANNUZZI & SONS, INC.; YONKERS  
 CONTRACTING COMPANY, INC.; YORK HUNTER  
 CONSTRUCTION, LLC; ZIEGENFUSS DRILLING, INC.;  
 DEPARTMENT OF BUSINESS SERVICES,  
 VERIZON NEW YORK INC.,

Defendants.

X

1 WORLD TRADE CENTER LLC  
530 Fifth Avenue-18 Floor  
New York, New York 10036

1 WTC HOLDINGS LLC  
530 Fifth Avenue-18 Floor  
New York, New York 10036

120 BROADWAY HOLDING, LLC,  
C/O SILVERSTEIN PROPERTIES  
530 FIFTH AVENUE-18TH FLOOR  
NEW YORK, NY 10036

2 WORLD TRADE CENTER LLC  
530 Fifth Avenue-18 Floor  
New York, New York 10036

2 WTC HOLDINGS LLC  
530 Fifth Avenue 18 Floor  
New York, New York 10036

4 WORLD TRADE CENTER LLC  
530 Fifth Avenue-18 Floor  
New York, New York 10036

4 WTC HOLDINGS LLC  
530 Fifth Avenue-18 Floor  
New York, New York 10036

5 WORLD TRADE CENTER LLC  
530 Fifth Avenue-18 Floor  
New York, New York 10036

5 WTC HOLDINGS LLC  
530 Fifth Avenue-18 Floor  
New York, New York 10036

A RUSSO WRECKING  
69 East Avenue  
Lawrence, NY 11559

ABM INDUSTRIES, INC.  
170 HAMILTON AVENUE  
WHITE PLAINS, NEW YORK 10601

ABM JANITORIAL NORTHEAST,  
INC.  
280 TRUMBULL STREET, 22 FLOOR  
NEW YORK, HARTFORD, CT 06103

AMEC CONSTRUCTION  
MANAGEMENT, INC.  
1633 Broadway 24<sup>th</sup> Flr  
New York, NY 10019

AMEC EARTH &

EAGLE ONE ROOFING  
CONTRACTORS INC.,  
18-60 45<sup>th</sup> Street  
Astoria, NY 11105

EAGLE SCAFFOLDING CO  
67 Mill Street  
Armitville, NY 11791

EJ DAVIES, INC.,  
1837 Steinway Street  
Astoria, NY 11105

EN-TECH CORP  
C/O SACKS MONTGOMERY  
Attn: Rick Rohr  
800 Third Avenue  
New York, NY 10022

ET ENVIRONMENTAL  
C/O CT CORPORATION SYSTEM  
111 Eighth Avenue  
New York, NY 10011

EVERGREEN RECYCLING OF  
CORONA  
127-50 Northern Blvd  
Flushing, NY 11368

EWELL W. FINLEY, P.C.,  
34-18 Northern Boulevard  
Long Island City, NY 11101

EXECUTIVE MEDICAL SERVICES,  
P.C.,  
15 Canal Road  
Pelham Manor, NY 10803

F&G MECHANICAL, INC.,  
348 New Country Road  
Secaucus, NJ 07094

FELIX EQUITIES, INC.  
C/O MATT VERULEN  
202 Lovell Street  
Lincolndale, NY 10540

FLEET TRUCKING, INC.  
457 BLAKE AVENUE # 1  
BROOKLYN, NY 11212

FRANCIS A. LEE COMPANY, A  
CORPORATION  
41 Bethpage Road  
Hicksville, NY 11801

F. & L. CONTRACTING CORP  
1 Kalisa Way Ste 301  
Paramus, NJ 07652

REGIONAL SCAFFOLD & HOISTING  
CO, INC.,  
3900 Webster Avenue  
Bronx, NY 10470

ROBER SHIMAN ASSOCIATES  
88 University Place  
New York, NY 10003

ROBERT L GEROSA, INC  
122 West Sheffield Avenue  
Englewood, NJ 07631

ROYAL GM INC.,  
112 Clarke Avenue  
Staten Island, NY 10306

SAB TRUCKING INC.  
C/O SAVERIO ANASTASIO  
7 Pironi Court  
Woodbury, NY 11797

SAFEWAY ENVIRONMENTAL CORP  
1379 Commerce Avenue  
Bronx, NY 10461

SEASONS INDUSTRIAL CONTRACTING,

SEASONS INDUSTRIAL  
CONTRACTING,  
266 GREEN VALLEY RD  
STATEN ISLAND, NY 10312

SHELDRAKE ORGANIZATION, INC  
80 N. Franklin Street  
Hempstead, NY 11550

SILVERITE CONTRACTORS  
520 Old Country Road  
Hicksville, NY 11801

SILVERSTEIN DEVELOPMENT  
CORP.  
529 Fifth Avenue  
New York, NY 10017-4608

SILVERSTEIN PROPERTIES, INC.  
530 Fifth Avenue 18 Floor  
New York, New York 10036

111 Eighth Avenue New York, NY 10011	FTI TRUCKING 14930 Powells Cove Boulevard Whitestone, NY 11357	New York, New York 10036
ATLANTIC HEYDT CORP 1281 METROPOLITAN AVE BROOKLYN, NY 11237	GILSANZ MURRAY STEFICEK, LLP 129 West 27 <sup>th</sup> Street 5 <sup>th</sup> Flr New York, NY 10001	SILVERSTEIN WTC FACILITY MANAGER LLC 530 Fifth Avenue-18 Floor New York, New York 10036
BECHTEL CONSTRUCTION, INC., C/O CT CORPORATION SYSTEM 111 Eighth Avenue New York, NY 10011	GOLDSTEIN ASSOCIATES CONSULTING ENGINEERS, PLLC 31 West 27 <sup>th</sup> Street New York, NY 10001	SILVERSTEIN WTC LLC 530 Fifth Avenue-18 Floor New York, New York 10036
BECHTEL CORPORATION C/O CT CORPORATION SYSTEM 111 Eighth Avenue New York, NY 10011	GRACE INDUSTRIES, INC. 151-21 6 <sup>th</sup> Road Whitestone, NY 11357-1206	SILVERSTEIN WTC MGM1 CO LLC 530 Fifth Avenue-18 Floor New York, New York 10036
BECHTEL ENVIRONMENTAL, INC., C/O CT CORPORATION SYSTEM 111 Eighth Avenue New York, NY 10011	HALLEN WELDING SERVICE, INC. 45-24 37 <sup>th</sup> Street Long Island City, NY 11101	SILVERSTEIN WTC PROPERTIES LLC 530 Fifth Avenue 18 Floor New York, New York 10036
BERKEL & COMPANY, CONTRACTORS, INC., C/O NATIONAL REGISTERED AGENTS, INC., 875 Avenue of the Americas, Suite 501 New York, NY 10001	HELMSMAN MANGEMENT SERVICES, INC. C/O CORPORATION SYSTEM 111 Eighth Avenue New York, NY 10011	SIMPSON GUMPERTZ & HEGGER C/O NATIONAL REGISTERED AGENTS, INC., 875 Avenue of the Americas, Suite 50 New York, NY 10001
BFP TOWER CO. LLC, C/O UNITED CORPORATE SERVICES, INC. 10 BANK STREET, SUITE 560 WHITE PLAINS, NY 10606	HCC CONTRACTING CORP 5201 Flushing Ave Brooklyn, NY 11237	SKIDMORE OWINGS & MERRILL LLP 14 Wall Street New York, NY 10005 2101
BIG APPLE WRECKING & CONSTRUCTION CORP 1379 Commerce Avenue Bronx, NY 10461	HIGH-RISE ELECTRIC, INC., 55 W. 58 <sup>th</sup> Street New York, NY 10019	STAR DELTA ELECTRIC 17 Battery Pl., Room 203 New York, NY 10004
BOVIS LEND LEASE LMB, INC. c/o Mound Cotton Wollan & Greengrass One Battery Park Plaza New York, NY 10004 Or- 200 Park Avenue New York, NY 10166	HIGH-RISE HOISTING AND SCAFFOLDING, INC 2820 Borden Avenue Long Island City, NY 11101	STIER ANDERSON LLC 30 Vreeland Drive Skillman, NJ 08558
BOVIS LEND LEASE, INC. c/o Mound Cotton Wollan & Greengrass One Battery Park Plaza New York, NY 10004	JP EQUIPMENT RENTAL MATERIALS, INC., 140 GRAND STREET, SUITE 501 WHITE PLAINS, NY 10601	SURVIVAJR 3001 S SUSAN ST SANTA ANA, CA 92704
	LAQUILA CONSTRUCTION INC 1590 Troy Avenue Brooklyn, NY 11234	TISHMAN CONSTRUCTION CORPORATION OF MANHATTAN 666 Fifth Avenue New York, NY 10103
	LASTRADA GENERAL CONTRACTING CORP 118-20 29 <sup>th</sup> Avenue College Point, NY 11354	TISHMAN CONSTRUCTION CORPORATION OF NEW YORK 666 Fifth Avenue New York, NY 10103
		TISHMAN SPEYER PROPERTIES,

New York, NY 10106

BREEZE CARTING CORP  
31 Bay Street  
Brooklyn, NY 11231

BREEZE NATIONAL, INC.,  
31 Bay Street  
Brooklyn, NY 11231

BRER-FOUR TRANSPORTATION  
CORP.  
33 Hewitt Street  
Hicksville, NY 11801

BURO HAPFOLD CONSULTING  
ENGINEERS, P.C.,  
105 Chambers Street  
New York, NY 10007

C & D FIREPROFFING &  
PLASTERING CORP  
48 Walnut Street  
New Rochelle NY 10801

C.B. CONTRACTING CORP  
4118 Victory Blvd  
Staten Island, NY 10314

CANRON CONSTRUCTION CORP  
C/O CT CORPORATION SYSTEM  
111 Eighth Avenue  
New York, NY 10011

CANTOR SEINUK GROUP  
228 East 45<sup>th</sup> Street  
New York, NY 10017

CERTIFIED FENCE CORP.  
59 Grant Street  
Harrison New York 10528

CIVETTA-COUSINS JV, L.L.C  
1100 East 156<sup>th</sup> Street  
Bronx, NY 10474

CLARCOR AIR FILTRATION  
PRODUCTS, INC.  
C/O CT Corporation Sysytem  
111 EIGHTH AVENUE  
NEW YORK, NY 10011

COMPONENT ASSEMBLY  
SYSTEMS, INC.,  
620 Fifth Avenue  
Pelham NY 10803

ENDREX, INC.  
170 Hamilton Avenue  
White Plains, NY 10601

LIBERTY MUTUAL INSURANCE  
COMPANY  
1818 MARKET STREET  
PHILADELPHIA, PA 19103

LIBERTY MUTUAL INSURANCE  
COMPANY  
630 MORRISON ROAD SUITE 300  
GAHANNA, OH 43230

LIBERTY MUTUAL INSURANCE  
COMPANY  
3850 NORTH CAUSEWAY  
BOULEVARD SUITE 603  
METairie, LA 70002

LIBERTY MUTUAL INSURANCE  
COMPANY  
165 DARTMOUTH STREET  
BOSTON, MA 02116

LIBERTY MUTUAL MANAGED  
CARE, INC.,  
C/O CT CORPORATION SYSTEM  
111 Eighth Avenue  
New York, NY 10011

LOCKWOOD KESSLER &  
BARTLETT, INC.  
One Aerial Way  
Syosset, New York 11791

LUCIUS PITKIN, INC  
50 Hudson Street  
New York, NY 10013-3389

LZA TECH-DIV OF THORNTON  
TOMASETTI  
641 Avenue of the Americas  
New York, NY 10011

MANAFORT BROTHERS, INC.  
C/O CT CORPORATION SYSTEM  
111 Eighth Avenue  
New York, NY 10011

MAZZOCCHI WRECKING, INC.  
C/O CT CORPORATION SYSTEM  
111 Eighth Avenue  
New York, NY 10011

MENT BROS. IRON WORKS CO.,

TOMASETTI GROUP  
641 Avenue of the Americas  
New York, NY 10011

TORRETTA TRUCKING, INC  
120 MOUNTAINVIEW AVENUE  
STATEN ISLAND, NY 10314

TOTAL SAFETY CONSULTING,  
L.L.C  
C/O THELLC  
5 Court Square  
Long Island City, NY 11101

TUCCI EQUIPMENT RENTAL CORP  
3495 Rembouts Avenue  
Bronx, NY 10475

TULLY CONSTRUCTION CO., INC.  
127-50 Northern Blvd  
Flushing, NY 11368  
Or-  
c/o Mound Cotton Wollan & Greengrass  
One Battery Park Plaza  
New York, NY 10004

TULLY CONSTRUCTION COMPAN  
127-50 Northern Blvd  
Flushing, NY 11368  
Or-  
c/o Mound Cotton Wollan & Greengrass  
One Battery Park Plaza  
New York, NY 10004

TULLY ENVIRONMENTAL INC.  
127-50 Northern Blvd  
Flushing, NY 11368

TULLY INDUSTRIES, INC.,  
127-50 Northern Blvd  
Flushing, NY 11368  
Or-  
c/o Mound Cotton Wollan & Greengrass  
One Battery Park Plaza  
New York, NY 10004

TURNER CONSTRUCTION CO.  
375 Hudson Street  
New York, NY 10014

TURNER CONSTRUCTION  
COMPANY  
375 Hudson Street  
New York, NY 10014

COMMUNICATIONS HOLDING  
COMPANY, INC.,  
4 Irving Place  
New York, New York 10003

CONSOLIDATED EDISON  
COMPANY OF NEW YORK, INC.,  
4 Irving Place  
New York, New York 10003

CONSOLIDATED EDISON  
DEVELOPMENT, INC.,  
4 Irving Place  
New York, New York 10003

CONSOLIDATED EDISON  
ENERGY, INC.,  
4 Irving Place  
New York, New York 10003

CONSOLIDATED EDISON  
SOLUTIONS, INC.,  
4 Irving Place  
New York, New York 10003

CONSOLIDATED EDISON, INC.,  
4 Irving Place  
New York, New York 10003

CONSULTING ENGINEERS, P.C.

COORDINATED METALS, INC.,  
626 16<sup>th</sup> Street  
Carlstadt, NJ 07072

CORD CONTRACTING CO., INC  
213 Roslyn Road  
Roslyn Hight, NY 11577

CRAIG TEST BORING COMPANY  
INC.  
PO Box 427  
Mays Landing, NJ 08330

CRITICOM INTERNATIONAL  
CORPORATION  
99 Pine Street, 3<sup>rd</sup> Floor  
Albany, NY 12207

CUSHMAN & WAKEFIELD, INC,  
C/O CORPORATION SYSTEM  
111 EIGHTH AVENUE  
NEW YORK, NY 10006

D'ONOFRIO GENERAL  
CONTRACTORS CORP

MERIDIAN CONSTRUCTION  
CORP.  
29 Grasmere Court  
Staten Island, NY 10305

MOODY'S INVESTORS SERVICE,  
C/O CT CORPORATION SYSTEM  
111 8TH AVENUE  
NEW YORK, NY 10011

MRA ENGINEERING P.C.,  
600 Hempstead Turnpike  
West Hempstead, NY 11552-1036

MUESER RUTLEDGE  
CONSULTING ENGINEERS  
225 West 34<sup>th</sup> Street  
New York, NY 10122

MUSCO SPORTS LIGHTING, LLC  
C/O CT CORPORATION SYSTEM  
111 Eighth Avenue  
New York, NY 10011

NACIREMA INDUSTRIES  
INCORPORATED  
211 West 5<sup>th</sup> Street  
Bayonne, NJ 07002

NEW YORK CRANE &  
EQUIPMENT CORP.  
Brooklyn Navy Yard  
Brooklyn, NY 11205

NICHOLSON CONSTRUCTION  
COMPANY  
C/O CT CORPORATION SYSTEM  
111 Eighth Avenue  
New York, NY 10011

NYC INDUSTRIAL DEVELOPMENT  
AGENCY  
C/O SILVERSTEIN PROPERTIES  
530 FIFTH AVENUE-18TH FLOOR  
NEW YORK, NY 10035

OLYMPIC PLUMBING & HEATING  
CORP  
COOPERMAN LEVITT &  
WINIKOFF, P.C.  
1129 Northern Boulevard  
Manhasset, NY 11030

OVE ARUP & PARTNERS P.C.,

570 Hudson Street  
New York, NY 10014

ULTIMATE DEMOLITIONS/CS  
HAULING  
500 New Street  
Oceanside, NY 11572

UNITED STATES REBAR, INC.,  
332 N. Main Street  
Freeport, NY 11520

VOLLMER ASSOCIATES LLP  
50 West 23<sup>rd</sup> Street  
New York, NY 10010

W HARRIS & SONS INC  
37 West Washington Avenue  
Pearl River, NY 10965

WEEKS MARINE, INC.  
4 Commerce Drive  
Cranford, NJ 07016

WEDLINGER ASSOCIATES,  
CONSULTING ENGINEERS, P.C.,  
375 Hudson Street, 12<sup>th</sup> Floor  
New York, NY 10014

WESTFIELD AMERICA, INC  
11601 Wilshire Boulevard  
Los Angeles, CA 90025

WESTFIELD WTC HOLDING LLC  
C/O CT Corporation System  
111 Eighth Avenue  
New York, NY 10011

WESTFIELD WTC, LLC  
C/O CT Corporation System  
111 Eighth Avenue  
New York, NY 10011

WFP TOWER D. CO., LP,  
222 BROADWAY  
NEW YORK, NY 10006

WHITNEY CONTRACTING INC.  
636 Saw Mill River Road  
Yonkers, NY 10701

WOLKOW-BRAKER ROOFING CO  
c/o WILLIAM ROTHBERG  
18 Court Street, Suite 2200  
Brooklyn, NY 11241

DAKOTA DEMO TECH  
140 Old Northport Road  
Kings Park, NY 11754

DCM ERECTORS, INC  
110 E. 42<sup>nd</sup> Street, Ste 1710  
New York, NY 10017

DIAMOND POINT EXCAVATING  
CORP  
c/o ELIZABETH L. CROZZOLI  
134-32 57<sup>th</sup> Avenue  
Flushing, NY 11355

DIEGO CONSTRUCTION, INC.  
C/O BUCKLEY TREACY  
SCHAFFEL MACKEY ABBATE &  
MOORE, ESQS  
1157 60th Street  
Brooklyn, NY 11209

DIVERSIFIED CARTING, INC.  
28 Garfield Avenue  
Bayshore, NY 11706

DMT ENTERPRISE, INC.  
255 Lake Avenue  
Yonkers, NY 10701

EAGLE LEASING & INDUSTRIAL  
SUPPLY  
1726 FLATBUSH AVENUE  
BROOKLYN, NY 11216

PARSON GROUP  
70 East 55<sup>th</sup> Street 5<sup>th</sup> Floor  
New York, NY 10022

PETER SCALAMANDRE & SONS,  
INC.  
157 Albany Avenue  
Freeport, NY 11520

PINNACLE ENVIRONMENTAL  
CORP  
c/o Paul O'Brien  
64-54 Maurice Avenue  
Maspeth, NY 11378

PLAZA CONSTRUCTION CORP.  
140 Palma Drive  
New York, NY 10304

PLAZA CONSTRUCTION  
MANAGEMENT CORP.  
43 New Dorp Plaza  
Staten Island, NY 10014

PRO SAFETY SERVICES, LLC  
c/o John Raucci  
2500 Westchester Avenue  
Purchase, NY 10577

550 Fifth Avenue-18 Floor  
New York, New York 10035

YANNUZZI & SONS INC  
56 Oakwood Avenue  
Orange, NJ 07050

YONKERS CONTRACTING  
COMPANY, INC.,  
959 Midland Avenue  
Yonkers NY 10704

YORK HUNTER CONSTRUCTION,  
LLC  
107 Old Goshen Road  
South Seaville, NJ 08246

ZIGENFUSS DRILLING, INC.,  
C/O CI CORPORATION SYSTEMS  
111 Eighth Avenue  
New York, NY 10011

Department Of Business Services  
110 William Street  
New York, NY 10038

VERIZON NEW YORK INC,  
1995 Avenue of the Americas  
New York, NY 10036-

06 07 2220

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

IN RE WORLD TRADE CENTER  
DISASTER SITE LITIGATION

SANTIAGO ALVEAR

Plaintiffs,

against

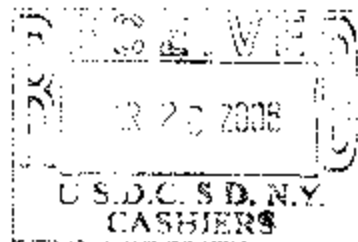
1 WORLD TRADE CENTER LLC; 1 WTC HOLDINGS LLC; 2 WORLD TRADE CENTER LLC; 2 WTC HOLDINGS LLC; 4 WORLD TRADE CENTER LLC; 4 WTC HOLDING LLC; 5 WORLD TRADE CENTER LLC; 5 WTC HOLDING LLC; A RUSSO WRECKING, INC.; ABM; ABM INDUSTRIES, INC.; ABM JANITORIAL NORTHEAST, INC.; AMEC CONSTRUCTION MANAGEMENT, INC.; AMEC EARTH & ENVIRONMENTAL, INC.; ANTHONY CORTESE SPECIALIZED HAULING LLC; ATLANTIC HEYDT CORP.; BECHTEL CONSTRUCTION, INC.; BECHTEL CORPORATION; BECHTEL ENVIRONMENTAL, INC.; BERKEIL & COMPANY, CONTRACTORS, INC.; BFP TOWER CO. LLC; BIG APPLE WRECKING & CONSTRUCTION CORP.; BOSTON PROPERTIES; BOVIS LEND LEASE LMB, INC.; BOVIS LEND LEASE, INC.; BREEZE CARTING CORP.; BREEZE NATIONAL INC.; BRER-FOUR TRANSPORTATION CORP.; BURO HAPFOLD CONSULTING ENGINEERS, P.C.; C & D FIREPROOFING & PLASTERING CORP.; C.B. CONTRACTING CORP.; CANRON CONSTRUCTION CORP.; CANTOR SEINUK GROUP; CERTIFIED FENCE CORP.; CIVETTA-COUSINS IV, L.L.C.; CLARCOR AIR FILTRATION PRODUCTS, INC.; COMPONENT ASSEMBLY SYSTEMS, INC.; CONSOLIDATED EDISON COMMUNICATIONS HOLDING COMPANY, INC.; CONSOLIDATED EDISON COMPANY OF NEW YORK, INC.; CONSOLIDATED EDISON DEVELOPMENT, INC.; CONSOLIDATED EDISON ENERGY, INC.;

21 MC 100 (AKH)

DOCKET NO.

CHECK-OFF ("SHORT FORM")  
COMPLAINT  
RELATED TO THE  
MASTER COMPLAINT

PLAINTIFF(S) DEMAND A TRIAL BY  
JURY



CONSOLIDATED EDISON SOLUTIONS, INC.;  
 CONSOLIDATED EDISON, INC.; COORDINATED  
 METALS, INC.; CORD CONTRACTING CO., INC.;  
 CRAIG TEST BORING COMPANY INC.; CRITICOM  
 INTERNATIONAL CORPORATION; CUSHMAN &  
 WAKEFIELD, INC.; D'ONOFRIO GENERAL  
 CONTRACTORS CORP.; DAKOTA DEMO-TECH,  
 INC.; DCM ERECTORS, INC.; DIAMOND POINT  
 EXCAVATING CORP.; DIEGO CONSTRUCTION,  
 INC.; DIVERSIFIED CARTING, INC.; DMT  
 ENTERPRISE, INC.; EAGLE LEASING & INDUSTRIAL  
 SUPPLY, INC.; EAGLE ONE ROOFING  
 CONTRACTORS INC; EAGLE SCAFFOLDING CO.,  
 INC.; BJ DAVIES, INC.; EN-TECH CORP.; ET  
 ENVIRONMENTAL; EVERGREEN RECYCLING OF  
 CORONA(EROC); EWELL W. FINLEY, P.C.;  
 EXECUTIVE MEDICAL SERVICES, P.C.; F&G  
 MECHANICAL, INC.; FELIX EQUITES, INC.;  
 FLEET TRUCKING, INC.; FRANCIS A. LEE  
 EXTERIOR RESTORATION, INC.; FRANK  
 MICELLI JR.CONTRACTING, INC.; FTI  
 TRUCKING, INC.; GILSANZ, MURRAY, & STEFCEK,  
 LLP; GOLDSTEIN ASSOCIATES CONSULTING ENGINEERS,  
 PLLC.; GRACE INDUSTRIES, INC.; HALLEN WELDING  
 SERVICE, INC.; HELMSMAN MANAGEMENT SERVICES, INC.;  
 HGC CONTRACTING CORP.; HIGH-RISE ELECTRIC, INC.;  
 HIGH RISE HOISTING AND SCAFFOLDING, INC.;  
 JP EQUIPMENT RENTAL MATERIALS, INC.;  
 LAQUILA CONSTRUCTION INC.; LASTRADA  
 GENERAL CONTRACTING CORP.; LESLIE E. ROBERTSON  
 ASSOCIATES CONSULTING ENGINEERS P.C.; LIBERTY  
 MUTUAL INSURANCE COMPANY; LIBERTY  
 MUTUAL MANAGED CARE INC.; LOCKWOOD,  
 KESSLER & BARTLETT, INC.; LUCUS PITKIN, INC.; LZA  
 TECH-DIV OF THORTON TOMASETTI; MANAFORT  
 BROTHERS INCORPORATED; MAZZOCCHI WRECKING, INC.;  
 MENT BROS. IRON WORKS CO., INC.; MERIDIAN  
 CONSTRUCTION GROUP; MOODY'S INVESTORS  
 SERVICE; MRA ENGINEERING, PC; MUESER  
 RUTLEDGE CONSULTING ENGINEERS, INC.;  
 MUSCO SPORTS LIGHTING, LLC.; NACIREMA INDUSTRIES  
 INCORPORATED; NEW YORK CRANE & EQUIPMENT CORP.;  
 NYC INDUSTRIAL DEVELOPMENT AGENCY; NICHOLSON  
 CONSTRUCTION COMPANY; OLYMPIC PLUMBING &  
 HEATING CORP.; OVE ARUP & PARTNERS P.C., PARSON  
 GROUP, INC.; PETER SCALAMANDRE & SONS, INC.;  
 PINNACLE; PINNACLE ENVIRONMENTAL CORP.; PLAZA  
 CONSTRUCTION CORP.; PLAZA CONSTRUCTION

MANAGEMENT CORP.; PRO SAFETY SERVICES LLC;  
PT & L CONTRACTING CORP., REGIONAL  
SCAFFOLDING & HOISTING CO., INC.; ROBER SILMAN  
ASSOCIATES; ROBERT ERRAT; ROBERT L.  
GEROSA, INC.; ROYAL GM, INC; SAB TRUCKING  
INC.; SAFEWAY ENVIRONMENTAL CORP.; SEASONS  
INDUSTRIAL CONTRACTING; SHIELDRAKE ORGANIZATION,  
INC.; SILVERITE CONTRACTING CORPORATION;  
SILVERSTEIN DEVELOPMENT CORP;  
SILVERSTEIN PROPERTIES INC; SILVERSTEIN  
PROPERTIES; SILVERSTEIN WTC FACILITY  
MANAGER LLC; SILVERSTEIN WTC LLC;  
SILVERSTEIN WTC MGMT CO. LLC;  
SILVERSTEIN WTC PROPERTIES LLC; SIMPSON  
CUMPERTZ & HEGER INC.; SKIDMORE, OWING & MERRILL  
LLP; STAR DELTA ELECTRIC, INC.; STIER  
ANDERSON, LLC; SURVIVAIR; TISHMAN  
CONSTRUCTION CORPORATION OF  
MANHATTAN; TISHMAN CONSTRUCTION  
CORPORATION OF NEW YORK; TISHMAN SPEYER  
PROPERTIES; TOMASETTI GROUP, INC.;  
TORRETTA TRUCKING, INC.; TOTAL SAFETY  
CONSULTING, LLC; TRIO ASBESTOS REMOVAL; TUCCI  
EQUIPMENT RENTAL CORP.; TULLY CONSTRUCTION  
CO., INC.; TULLY CONSTRUCTION COMPANY;  
TULLY ENVIRONMENTAL INC.; TULLY  
INDUSTRIES, INC.; TURNER CONSTRUCTION  
CO.; TURNER CONSTRUCTION COMPANY;  
TURNER CONSTRUCTION INTERNATIONAL,  
LLC; ULTIMATE DEMOLITION/CS HAULING  
(JOINT VENTURE); UNITED STATES REBAR, INC.;  
VOLLMER ASSOCIATES LLP; W HARRIS & SONS INC.;  
WEEKS MARINE, INC.; WEIDINGER ASSOCIATES,  
CONSULTING ENGINEERS, P.C.; WESTFIELD  
AMERICA, INC; WESTFIELD WTC HOLDING LLC;  
WESTFIELD WTC, LLC; WFP Tower D. Co., LP;  
WHITNEY CONTRACTING INC.; WOLKOW-BRAKER  
ROOFING CORP.; WORLD TRADE CENTER  
PROPERTIES LLC; YANNUZZI & SONS, INC;  
YONKERS CONTRACTING COMPANY, INC.; YORK HUNTER  
CONSTRUCTION, LLC; ZIEGENFUSS DRILLING, INC.;  
DEPARTMENT OF BUSINESS SERVICES,  
VERIZON COMMUNICATIONS, INC,

Defendants.

By Order of the Honorable Alvin K. Hellerstein, United States District Judge, dated May 12, 2005, ("the Order"), a Master Complaint for all Plaintiffs was filed on May 12, 2005.

NOTICE OF ADOPTION

All headings and paragraphs in the Master Complaint are applicable to and are adopted by the instant Plaintiff(s) as if fully set forth herein in addition to those paragraphs specific to the individual Plaintiff(s), which are listed below. These are marked with an "☑" if applicable to the instant Plaintiff(s), and specific case information is set forth, as needed, below.

Plaintiffs, SANTIAGO ALVEAR, by his/her/their attorneys WORBY GRONER EDELMAN & NAPOLI BERN, LLP, complaining of Defendant(s), respectfully allege:

**I. PARTIES**

**A. PLAINTIFF(S)**

1. ☐ Plaintiff, \_\_\_\_\_ (hereinafter the "Injured Plaintiff"), is an individual and a citizen of the State of New York residing at \_\_\_\_\_.

(OR)

2. Alternatively,

A. ☑ Plaintiff, SANTIAGO ALVEAR (hereinafter the "Injured Plaintiff"), is an individual and a citizen of New Jersey residing at 104A 40th Street, Union City, NJ 07087-.

B. ☐ \_\_\_\_\_ as the \_\_\_\_\_ of Decedent \_\_\_\_\_ and brings this claim in his (her) capacity as \_\_\_\_\_ of the Estate of \_\_\_\_\_.

*Please read this document carefully.  
It is very important that you fill out each and every section of this document.*

3. ☐ Plaintiff, \_\_\_\_\_, (hereinafter the "Derivative Plaintiff"), is a citizen of \_\_\_\_\_, residing at \_\_\_\_\_, and has the following relationship to the Injured Plaintiff:

- ☐ SPOUSE at all relevant times herein, is and has been lawfully married to Plaintiff \_\_\_\_\_, and brings this derivative action for her (his) loss due to the injuries sustained by her husband (his wife), Plaintiff \_\_\_\_\_.
- ☐ Parent:
- ☐ Child:
- ☐ Other: \_\_\_\_\_

4. In the period from 10/1/2001 to 10/15/2001, the Injured Plaintiff worked for Kiss Construction, Inc., and LBI - ABAS as a and Hardier at:

*Please be as specific as possible when filling in the following dates and locations*

i. ☒ The World Trade Center Site

1. Location(s) (i.e., building, quadrant, etc.) \_\_\_\_\_
2. From on or about 10/1/2001 until 10/15/2001;
3. Approximately 12 hours per day; for
4. Approximately 13 days total.

ii. ☐ The New York City Medical Examiner's Office

1. From on or about \_\_\_\_\_ until \_\_\_\_\_
2. Approximately \_\_\_\_\_ hours per day; for
3. Approximately \_\_\_\_\_ days total.

iii. ☐ The Fresh Kills Landfill

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It is very important that you fill out each and every section of this document.***

1. From on or about \_\_\_\_\_ until \_\_\_\_\_;
2. Approximately \_\_\_\_\_ hours per day; for
3. Approximately \_\_\_\_\_ days total.

iv. ☐ The Barge

1. From on or about \_\_\_\_\_ until \_\_\_\_\_;
2. Approximately \_\_\_\_\_ hours per day; for
3. Approximately \_\_\_\_\_ days total.

- v. ☐ **Other:**\* For injured plaintiffs who worked at Non-WTC Site building or location. The injured plaintiff worked at the address/location, for the dates alleged, for the hours per day, for the total days, and for the employer, as specified below:

1. From on or about \_\_\_\_\_ until \_\_\_\_\_;
2. Approximately \_\_\_\_\_ hours per day; for
3. Approximately \_\_\_\_\_ days total;
4. Name and Address of Non-WTC Site Building/Worksite:  
Stuyvesant High School, 345 Chambers Street, at North End Avenue,  
New York, NY  
Verizon, 140 West Street, New York, NY 10007-

*\*Continue this information on a separate sheet of paper if necessary.*

*If more space is needed to specify "Other" locations, please annex a separate sheet of paper with the information.*

5. Injured Plaintiff

- ☒ Was exposed to and breathed noxious fumes on all dates at the site(s) indicated above;
- ☒ Was exposed to and inhaled or ingested toxic substances and particulates on all dates at the site(s) indicated above;
- ☒ Was exposed to and absorbed or touched toxic or caustic substances on all dates at the site(s) indicated above;
- ☒ Other: Not yet determined.

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6. Injured Plaintiff

- ☒ Has not made a claim to the Victim Compensation Fund. Pursuant to §405(c)(3)(B)(i) of the Air Transportation Safety and System Stabilization Act, 49 U.S.C. § 40101, the issue of waiver is inapplicable.
- ☐ Made a claim to the Victim Compensation Fund that was denied. Pursuant to § 405(c)(3)(B)(i) of the Air Transportation Safety and System Stabilization Act, 49 U.S.C. § 40101, the issue of waiver is inapplicable.
- ☐ Made a claim to the Victim Compensation Fund, that was subsequently withdrawn by Ground-Zero Plaintiff. Pursuant to § 405(c)(3)(B)(i) of the Air Transportation Safety and System Stabilization Act, 49 U.S.C. § 40101, the issue of waiver is inapplicable.
- ☐ Made a claim to the Victim Compensation Fund that was granted. Pursuant to § 405(c)(3)(B)(i) of the Air Transportation Safety and System Stabilization Act, 49 U.S.C. § 40101, Ground Zero-Plaintiff has waived her/his right(s) to pursue any further legal action for the injuries-identified in said claim.

**B. DEFENDANT(S)**

The following is a list of all Defendant(s) named in the Master Complaint. If checked, all paragraphs pertaining to that Defendant are deemed pleaded herein.

☐ THE CITY OF NEW YORK

- ☐ A Notice of Claim was timely filed and served on \_\_\_\_\_ and \_\_\_\_\_ pursuant to General Municipal Law §50-h the CITY \_\_\_\_\_ (OR)
- ☐ The City has yet to hold a hearing as required by General Municipal Law §50-h
- ☐ More than thirty days have past and the City has not adjusted the claim
- (AND/OR)

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☐ An Order to Show Cause application to

☐ deem Plaintiff's (Plaintiffs') Notice of Claim timely filed, or in the alternative to grant Plaintiff(s) leave to file a late Notice of Claim *Nunc Pro Tunc* (for leave to file a late Notice of Claim *Nunc Pro Tunc*) has been filed and a determination

☐ is pending

☐ Granting petition was made on \_\_\_\_\_

☐ Denying petition was made on \_\_\_\_\_

☐ PORT AUTHORITY OF NEW YORK AND NEW JERSEY ["PORT AUTHORITY"]

☐ A Notice of Claim was filed and served pursuant to Chapter 179, §7 of The Unconsolidated Laws of the State of New York on

☐ More than sixty days have elapsed since the Notice of Claim was filed, (and)

☐ the PORT AUTHORITY has adjusted this claim

☐ the PORT AUTHORITY has not adjusted this claim.

- ☒ 1 WORLD TRADE CENTER, LLC
- ☒ 1 WTC HOLDINGS, LLC
- ☒ 2 WORLD TRADE CENTER, LLC
- ☒ 2 WTC HOLDINGS, LLC
- ☒ 4 WORLD TRADE CENTER, LLC
- ☒ 4 WTC HOLDINGS, LLC
- ☒ 5 WORLD TRADE CENTER, LLC
- ☒ 5 WTC HOLDINGS, LLC
- ☒ AMEC CONSTRUCTION MANAGEMENT, INC.
- ☒ BECHTEL ASSOCIATES PROFESSIONAL CORPORATION
- ☒ BECHTEL CONSTRUCTION, INC.
- ☒ BECHTEL CORPORATION

***Please read this document carefully.  
It is very important that you fill out each and every section of this document.***

- ☒ BECHTEL ENVIRONMENTAL, INC.
- ☒ BOVIS HOLDINGS LIMITED
- ☒ BOVIS INTERNATIONAL, INC.
- ☒ BOVIS LEND LEASE, INC.
- ☒ BOVIS LEND LEASE INTERIORS, INC.
- ☒ BOVIS LEND LEASE LMB, INC.
- ☒ CONSOLIDATED EDISON COMMUNICATIONS HOLDING COMPANY, INC.
- ☒ CONSOLIDATED EDISON COMPANY OF NEW YORK, INC.
- ☒ CONSOLIDATED EDISON DEVELOPMENT, INC.
- ☒ CONSOLIDATED EDISON ENERGY, INC.
- ☒ CONSOLIDATED EDISON, INC.
- ☒ CONSOLIDATED EDISON SOLUTIONS, INC.
- ☒ LIBERTY MUTUAL MANAGED CARE, INC.
- ☒ PLAZA CONSTRUCTION CORP.
- ☒ PLAZA CONSTRUCTION MANAGEMENT CORP.
- ☒ SILVERSTEIN PROPERTIES
- ☒ SILVERSTEIN PROPERTIES, INC.
- ☒ SILVERSTEIN WTC FACILITY MANAGER, LLC
- ☒ SILVERSTEIN WTC, LLC
- ☒ SILVERSTEIN WTC MANAGEMENT CO., LLC
- ☒ SILVERSTEIN WTC PROPERTIES, LLC
- ☒ TISHMAN CONSTRUCTION CORPORATION OF MANHATTAN
- ☒ TISHMAN CONSTRUCTION CORPORATION OF NEW YORK
- ☒ TULLY CONSTRUCTION CO., INC.
- ☒ TULLY CONSTRUCTION COMPANY
- ☒ TULLY ENVIRONMENTAL INC.
- ☒ TULLY INDUSTRIES, INC.
- ☒ TURNER CONSTRUCTION CO.
- ☒ TURNER CONSTRUCTION COMPANY
- ☒ TURNER CONSTRUCTION INTERNATIONAL, LLC
- ☒ TURNER/PLAZA, A JOINT VENTURE

*Please read this document carefully.*

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- ☒ WESTFIELD AMERICA, INC.  
☒ WESTFIELD WTC, LLC, NOW KNOWN AS WTC RETAIL, LLC  
☒ WESTFIELD WTC HOLDING, LLC  
☒ WORLD TRADE CENTER PROPERTIES, LLC  
☒ OTHER: SEE ADDENDUM A

☐ Non-WTC Site Building Owner

Name: \_\_\_\_\_

Business/Service Address: \_\_\_\_\_

Building/Worksite Address: \_\_\_\_\_

☐ Non-WTC Site Lessee

Name: \_\_\_\_\_

Business/Service Address: \_\_\_\_\_

Building/Worksite Address: \_\_\_\_\_

☐ Non-WTC Site Building Managing Agent

Name: \_\_\_\_\_

Business/Service Address: \_\_\_\_\_

Building/Worksite Address: \_\_\_\_\_

## II. JURISDICTION

The Court's jurisdiction over the subject matter of this action is:

- ☐ Founded upon Federal Question Jurisdiction; specifically  
☐ Air Transport Safety & System Stabilization Act of 2001, (or)  
☐ Federal Officers Jurisdiction, (or)  
☐ Other (specify): \_\_\_\_\_

*Please read this document carefully.  
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- ☒ Contested, but the Court has already determined that it has removal jurisdiction over this action, pursuant to 28 U.S.C. § 1441

### III. CAUSES OF ACTION

Plaintiff(s) seeks damages against the above named defendants based upon the following theories of liability, and asserts each element necessary to establish such a claim under the applicable substantive law:

- ☒ Breach of the defendants' duties and obligations pursuant to the New York State Labor Law(s) including §§ 200 and 240
- ☒ Breach of the defendants' duties and obligations pursuant to the New York State Labor Law 241(6)
- ☒ Pursuant to New York General Municipal Law §205 a
- ☒ Pursuant to New York General Municipal Law §205-c
- ☒ Common Law Negligence
- ☒ Medical Monitoring
- ☒ Fear of Cancer
- ☒ Fraud and Misrepresentation
- ☒ Air Quality;
- ☒ Effectiveness of Mask Provided;
- ☐ Effectiveness of Other Safety Equipment Provided  
(specify: \_\_\_\_\_);
- ☒ Other(specify): Not yet determined
- ☐ Wrongful Death
- ☐ Loss of Services/Loss of Consortium for Derivative Plaintiff
- ☐ Other: \_\_\_\_\_

*Please read this document carefully.  
It is very important that you fill out each and every section of this document.*

#### IV. CAUSATION, INJURY AND DAMAGE

1. As a direct and proximate result of defendant's culpable actions in the rescue and/or recovery and/or construction, renovation, alteration, demolition and all work performed at the premises, the injured Plaintiff sustained (including, but not limited to) the following injuries:

- ☐ Abdominal Pain  
Date of onset: \_\_\_\_\_  
Date physician first connected this injury to WTC work: \_\_\_\_\_
- ☒ Asthma  
Date of onset: 3/21/2003  
Date physician first connected this injury to WTC work: To be supplied at a later date
- ☐ Brain Tumor  
Date of onset: \_\_\_\_\_  
Date physician first connected this injury to WTC work: \_\_\_\_\_
- ☐ Burns  
Location of burn (body part/percent) \_\_\_\_\_;  
Date of onset: \_\_\_\_\_  
Date physician first connected this injury to WTC work: \_\_\_\_\_
- ☐ Chronic Bronchitis  
Date of onset: \_\_\_\_\_  
Date physician first connected this injury to WTC work: \_\_\_\_\_
- ☒ Chronic Cough  
Date of onset: To be supplied at a later date  
Date physician first connected this injury to WTC work: To be supplied at a later date
- ☐ Chronic Obstructive Lung Disease  
Date of onset: \_\_\_\_\_  
Date physician first connected this injury to WTC work: \_\_\_\_\_
- ☐ Dermatitis  
Date of onset: \_\_\_\_\_  
Date physician first connected this injury to WTC work: \_\_\_\_\_
- ☒ Fear of Cancer  
Date of onset: 6/6/2005  
Date physician first connected this injury to WTC work: To be supplied at a

*Please read this document carefully.*

*It is very important that you fill out each and every section of this document.*

later date

Gastric Reflux

Date of onset: \_\_\_\_\_

Date physician first connected this injury to WTC work: \_\_\_\_

Hypertension

Date of onset: \_\_\_\_\_

Date physician first connected this injury to WTC work: \_\_\_\_\_

Indigestion

Date of onset: \_\_\_\_\_

Date physician first connected this injury to WTC work: \_\_\_\_

Insomnia

Date of onset: \_\_\_\_

Date physician first connected this injury to WTC work: \_

Leukemia

Date of onset: \_\_\_\_\_

Date physician first connected this injury to WTC work: \_\_\_\_\_

Lung Cancer

Date of onset: \_\_\_\_\_

Date physician first connected this injury to WTC work: \_

Lymphoma

Date of onset: \_\_\_\_\_

Date physician first connected this injury to WTC work: \_

Nausea

Date of onset: \_\_\_\_\_

Date physician first connected this injury to WTC work: \_\_\_\_\_

Pulmonary Fibrosis

Date of onset: \_\_\_\_\_

Date physician first connected this injury to WTC work: \_\_\_\_

☒ Shortness of Breath

Date of onset: 6/6/2005

Date physician first connected this injury to WTC work: To be supplied at a later date

☒ Sinusitis

Date of onset: 3/21/2003

Date physician first connected this injury to WTC work: To be supplied at a

*Please read this document carefully.*

*It is very important that you fill out each and every section of this document.*

later date

- ☒ Other: Chronic Headaches; Headaches, Dizziness, Migraines; Rhinitis; Sore Throat; and Throat Problems

Date of onset: 3/21/2003

Date physician first connected this injury to WTC work: To be supplied at a later date

*NOTE: The foregoing is NOT an exhaustive list of injuries that may be alleged.*

2. As a direct and proximate result of the injuries identified in paragraph "1", above, the Ground Zero Plaintiff has in the past suffered and/or will in the future suffer the following compensable damages.

- ☒ Pain and suffering
- ☒ Loss of the pleasures of life
- ☒ Loss of earnings and/or impairment of earning capacity
- ☒ Loss of retirement benefits/diminution of retirement benefits
- ☒ Expenses for medical care, treatment, and rehabilitation
- ☒ Other:
  - ☒ Mental anguish
  - ☒ Disability
  - ☒ Medical monitoring
  - ☒ Other: Not yet determined.

3. As a direct and proximate result of the injuries described *supra*, the derivative plaintiff(s), if any, have in the past suffered and/or will in the future suffer a loss of the love, society, companionship, services, affection, and support of the plaintiff and such other losses, injuries and damages for which compensation is legally appropriate.

*Please read this document carefully.  
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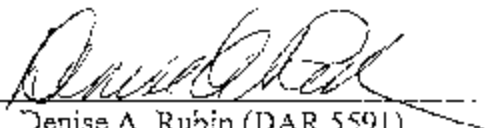
**WHEREFORE**, plaintiff(s) respectfully pray that the Court enter judgment in his/her/their favor and against defendant(s) for damages, costs of suit and such other, further and different relief as may be just and appropriate.

**Plaintiff(s)** demands that all issues of fact in this case be tried before a properly empanelled jury.

Dated: New York, New York  
March 20, 2006

Yours, etc.,

**Worby, Groner Edelman & Napoli Bern, LLP**  
Attorneys for Plaintiff(s), Santiago Alvear

By:   
Denise A. Rubin (DAR 5591)  
115 Broadway, 12<sup>th</sup> Floor  
New York, New York 10006  
Phone: (212) 267-3700

*Please read this document carefully.  
It is very important that you fill out each and every section of this document.*

## ADDENDUM A

Plaintiff(s), Santiago Alvear repeat(s), reiterate(s), and reallege(s) paragraphs 331 through paragraph 505 of the Master Complaint with the same force and effect as if set forth more fully at length therein as against the following defendants:

- ☐ 150 BROADWAY N.Y. ASSOCS. L. P.,
- ☐ 160 WATER ST. INC
- ☐ 30 BROAD STREET ASSOCIATES, LLC,
- ☒ A RUSSO WRECKING
- ☒ ABM INDUSTRIES, INC.
- ☒ ABM JANITORIAL NORTHEAST, INC.
- ☒ AMEC EARTH & ENVIRONMENTAL, INC.
- ☒ ATLANTIC HEYDT CORP
- ☒ BECHTEL CONSTRUCTION, INC
- ☒ BECHTEL CORPORATION
- ☒ BECHTEL ENVIRONMENTAL, INC.,
- ☒ BERKEL & COMPANY, CONTRACTORS, INC.
- ☐ BFP ONE LIBERTY PLAZA CO., LLC,
- ☒ BFP TOWER C CO. LLC,
- ☒ BIG APPLE WRECKING & CONSTRUCTION CORP
- ☐ BOSTON PROPERTIES,
- ☐ BRANCH SERVICES
- ☒ BREEZE CARTING CORP
- ☒ BREEZE NATIONAL, INC.
- ☒ BRER-FOUR TRANSPORTATION CORP.
- ☐ BROOKFIELD FINANCIAL PROPERTIES, INC.,
- ☐ BROWN HARRIS STEVENS,
- ☒ BURO HAPPOLD CONSULTING ENGINEERS, P.C.
- ☒ C & D FIREPROFFING & PLASTERING CORP

- ☒ C.B. CONTRACTING CORP
- ☐ CALEDONIAN INSURANCE COMPANY
- ☒ CANRON CONSTRUCTION CORP
- ☒ CANTOR SEINUK GROUP
- ☐ CAPITAL PROPERTIES, INC,
- ☐ CARLOS CONSTRUCTION
- ☒ CERTIFIED FENCE CORP.
- ☒ CIVETTA-COUSINS JV, L.L.C
- ☒ CLARCOR AIR FILTRATION PRODUCTS, INC.
- ☒ COMPONENT ASSEMBLY SYSTEMS, INC.
- ☒ CONSULTING ENGINEERS, P C.
- ☐ COOPER SQUARE REALTY, INC,
- ☒ COORDINATED METALS, INC.
- ☒ CORD CONTRACTING CO., INC
- ☒ CRAIG TEST BORING COMPANY INC.
- ☒ CRITICOM INTERNATIONAL CORPORATION
- ☒ CUSHMAN & WAKEFIELD, INC,
- ☒ DAKOTA DEMO-TECH
- ☒ DCM ERECTORS, INC
- ☒ DEPARTMENT OF BUSINESS SERVICES
- ☐ DEUTSCHE BANK
- ☒ DIAMOND POINT EXCAVATING CORP
- ☒ DIEGO CONSTRUCTION, INC.
- ☒ DIVERSIFIED CARTING, INC.
- ☒ DMT ENTERPRISE, INC.
- ☒ D'ONOFRIO GENERAL CONTRACTORS CORP
- ☒ EAGLE LEASING & INDUSTRIAL SUPPLY
- ☒ EAGLE ONE ROOFING CONTRACTORS INC.
- ☒ EAGLE SCAFFOLDING CO
- ☒ EJ DAVIES, INC.
- ☐ EMPIRE STATE PROPERTIES, INC

- ☒ EN-TECH CORP
- ☒ ET ENVIRONMENTAL
- ☒ EVERGREEN RECYCLING OF CORONA
- ☒ EWHILL W. FINLEY, P.C.
- ☒ EXECUTIVE MEDICAL SERVICES, P.C.
- ☒ F&G MECHANICAL, INC.
- ☒ FELIX EQUITIES, INC.
- ☒ FLEET TRUCKING, INC.
- ☒ FRANCIS A. LEE COMPANY, A CORPORATION
- ☒ FRANCIS MICELLI JR CONTRACTING
- ☒ FTI TRUCKING
- ☒ GILSANZ MURRAY STEFICEK, LLP
- ☐ GLO MANAGEMENT, INC.,
- ☒ GOLDSTEIN ASSOCIATES CONSULTING ENGINEERS, PLLC
- ☒ GRACE INDUSTRIES, INC.
- ☐ GRUBB & ELLIS MANAGEMENT SERVICES, INC.,
- ☒ HALLEN WELDING SERVICE, INC.
- ☒ HELMSMAN MANGEMENT SERVICES, INC.
- ☒ HGC CONTRACTING CORP
- ☒ HIGH-RISE ELECTRIC, INC.
- ☒ HIGH-RISE HOISTING AND SCAFFOLDING, INC.
- ☐ J.P. MORGAN CHASE CORPORATION,
- ☐ JEMB REALTY CORP
- ☒ JP EQUIPMENT RENTAL MATERIALS, INC
- ☐ KIBEL COMPANIES,
- ☒ LAQUILA CONSTRUCTION INC
- ☒ LASTRADA GENERAL CONTRACTING CORP
- ☐ LEFRAK ORGANIZATION INC
- ☒ LESLIE E. ROBERTSON ASSOCIATES CONSULTING ENGINEER P.C.
- ☒ LIBERTY MUTUAL INSURANCE COMPANY

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- ☒ LIBERTY MUTUAL INSURANCE COMPANY
- ☒ LIBERTY MUTUAL MANAGED CARE, INC.
- ☒ LOCKWOOD KESSLER & BARTLETT, INC.
- ☒ LUCIUS PITKIN, INC
- ☒ LZA TECH-DIV OF THORTON TOMASETTI
- ☒ MANAFORT BROTHERS, INC.
- ☐ MAYORE ESTATES LLC,
- ☒ MAZZOCCHI WRECKING, INC.
- ☒ MEDCORE MEDICAL AND HOSPITAL SUPPLY
- ☒ MENT BROS. IRON WORKS CO., INC.
- ☒ MERIDIAN CONSTRUCTION CORP.
- ☐ MILFORD MANAGEMENT CORP,
- ☐ MILSTEIN PROPERTIES CORP.,
- ☒ MOODY'S INVESTORS SERVICE,
- ☒ MRA ENGINEERING P.C.
- ☒ MUESER RUTLEDGE CONSULTING ENGINEERS
- ☐ MURRAY HILL PROPERTIES,
- ☒ MUSCO SPORTS LIGHTING, LLC
- ☒ NACIREMA INDUSTRIES INCORPORATED
- ☒ NEW YORK CRANE & EQUIPMENT CORP.
- ☒ NICHOLSON CONSTRUCTION COMPANY
- ☒ NYC INDUSTRIAL DEVELOPMENT AGENCY,
- ☒ OLYMPIC PLUMBING & HEATING CORP
- ☐ ONE WALL STREET CORPORATION,
- ☒ OVE ARUP & PARTNERS P.C.
- ☒ PARSON GROUP
- ☒ PETER SCALAMANDRE & SONS, INC.
- ☒ PINNACLE ENVIRONMENTAL CORP
- ☒ PRO SAFETY SERVICES, LLC

- ☒ PT & L CONTRACTING CORP
- ☒ REGIONAL SCAFFOLD & HOISTING CO, INC.
- ☒ ROBER SILMAN ASSOCIATES
- ☒ ROBERT L GEROSA, INC
- ☐ ROCKROSE DEVELOPMENT CORP,
- ☒ ROYAL GM INC.
- ☐ RY MANAGEMENT
- ☒ SAB TRUCKING INC.
- ☒ SAFEWAY ENVIRONMENTAL CORP
- ☐ SAKELE BROTHERS, L.L.C,
- ☒ SEASONS INDUSTRIAL CONTRACTING
- ☒ SHELDRAKE ORGANIZATION, INC.
- ☒ SILVERITE CONTRACTORS
- ☒ SILVERSTEIN DEVELOPMENT CORP.
- ☒ SILVERSTEIN WTC PROPERTIES LLC
- ☒ SIMPSON GUMPertz & HEGER INC
- ☒ SKIDMORE OWINGS & MERRILL LLP
- ☒ STAR DELTA ELECTRIC
- ☒ STIER ANDERSON LLC
- ☒ SURVIVAIR
- ☐ THE BANK OF NEW YORK,
- ☐ THE RELATED COMPANIES, LP,
- ☒ TISHMAN SPEYER PROPERTIES,
- ☒ TOMASETTI GROUP
- ☒ TORRETTA TRUCKING, INC
- ☒ TOTAL SAFETY CONSULTING, L.L.C
- ☐ TRAMMELL CROW COMPANY,
- ☐ TRINITY CENTRE, LLC,
- ☐ TRIO ASBESTOS REMOVAL,
- ☒ TUCCI EQUIPMENT RENTAL CORP

- ☒ ULTIMATE DEMOLITIONS/CS HAULING
- ☒ UNITED STATES REBAR, INC.
- ☒ VERIZON NEW YORK INC,
- ☒ VOLLMER ASSOCIATES LLP
- ☒ W HARRIS & SONS INC
- ☒ WEEKS MARINE, INC.
- ☒ WHIDLINGER ASSOCIATES, CONSULTING ENGINEERS, P.C.
- ☐ WFP TOWER A. CO., L.P.,
- ☐ WFP TOWER B. CO., L.P.,
- ☒ WFP TOWER D. CO., LP,
- ☒ WHITNEY CONTRACTING INC
- ☒ WOLKOW-BRAKER ROOFING CORP
- ☒ YANNUZZI & SONS INC
- ☒ YONKERS CONTRACTING COMPANY, INC.
- ☒ YORK HUNTER CONSTRUCTION, LLC
- ☐ ZAR REALTY MANAGEMENT CORP.,
- ☐ ZECKENDORF REALTY

ATTORNEY VERIFICATION

DENISE A. RUBIN, an attorney at law, duly admitted to practice in the Courts of the State of New York, affirms under the penalties of perjury that:

She is the attorney for the plaintiff(s) in the above-entitled action. That she has read the foregoing SUMMONS AND VERIFIED COMPLAINT and knows the contents thereof, and upon information and belief, deponent believes the matters alleged therein to be true.

The reason this Verification is made by deponent and not by the plaintiff(s) is that the plaintiff(s) herein reside(s) in a county other than the one in which the plaintiff's attorneys maintain their office.

The source of deponent's information and the grounds of his belief are communication, papers, reports and investigation contained in the file.

DATED: New York, New York  
March 20, 2006

  
DENISE A. RUBIN

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

=====

Santiago Alvear,

Plaintiff(s)

- against -

1 WORLD TRADE CENTER I.L.C, et al.

Defendant(s).

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**SUMMONS AND VERIFIED COMPLAINT**

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**WORBY GRONER EDELMAN & NAPOLI BERN, LLP**

*Attorneys for: Plaintiff(s)*

*Office and Post Office Address, Telephone*

115 Broadway - 12th Floor

New York, New York 10006

(212) 267-3700

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To

Attorney(s) for

=====

Service of a copy of the within

is hereby admitted.

Dated,

\_\_\_\_\_  
Attorney(s) for

=====

**PLEASE TAKE NOTICE:**

☐ **NOTICE OF ENTRY**

that the within is a (certified) true copy of an

duly entered in the office of the clerk of the within named court on 20

☐ **NOTICE OF SETTLEMENT**

that an order

will be presented for settlement to the HON.

the

within named Court, at

on 20

Dated,

at

of which the within is a true copy

one of the judges of

M.

Yours, etc.,

WORBY GRONER EDELMAN & NAPOLI BERN, LLP

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